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January 4, 2024

Via ECF, E-mail & Facsimile

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007
Fax: (212) 805-7942

SO ORDERED.

/s Alvin K. Hellerstein
U.S.D.J.
January 5, 2024

Re: *United States v. Cliver Alcalá Cordones*, 11 Cr. 205 (AKH)

Dear Judge Hellerstein:

We represent Cliver Alcalá Cordones in the above-referenced matter. We write, with the consent of the government, to respectfully request permission to file General Alcalá's sentencing submission, which is currently due today, on the same day that the United States Probation Office ("Probation") files the final Presentence Report ("PSR") for General Alcalá.

It was our understanding, based on communications with Probation, that the final PSR for General Alcalá would be filed today. However, Probation has not yet filed the final PSR and we are concerned that it might not be filed tonight. Probation has not responded to our most recent communications asking for a status update as to when it anticipates filing the final PSR. To file General Alcalá's sentencing submission we need to be able to address the sentencing recommendation made by Probation and whether there are outstanding objections to the PSR that need to be addressed with the Court. We are unable to do either until Probation has filed and we have had a chance to review the final PSR.

Accordingly, we respectfully request permission to file General Alcalá's sentencing submission on the same day that Probation files the final PSR. The government consents to this request. We apologize for filing this request on the day the submission is due but we were under the impression that the final PSR would be filed today and such an application would not be necessary. We thank the Court for its consideration.

Respectfully submitted,

/s/

César de Castro
Valerie A. Gotlib
Adam S. Kaufmann
Cristian Francos

Cc: all counsel of record (*via* ECF)